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May 5, 2008

BY HAND DELIVERY

Honorable. Sidney H. Stein
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10001

OUR FILE NUMBER
91015-03

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MEMO ENDORSED

Re: **United States v. Coplan, et al. S1 07 Cr. 453 (SHS)**

Dear Judge Stein:

We enclose a courtesy copy of Mr. Bolton's motion to transfer this matter as to him to his home city of Memphis, Tennessee, pursuant to Federal Rule of Civil Procedure 21(b), along with a memorandum of law and supporting documents. Pursuant to Your Honor's April 29, 2008 Order, we are filing today a redacted copy of these papers with the Clerk of the Court because the motion contains references to personal information relating to Mr. Bolton and his family.

The Court set today as the deadline for the filing of defendants' motions relating to any discovery the government had produced up to this point. Because Mr. Bolton was added to the Indictment relatively recently, however, we have not had as long to review what is a massive amount of discovery that the government had produced to the other defendants well before Mr. Bolton was added to the Indictment. Accordingly, with the government's consent, we respectfully request that the Court allow us until July 15, 2008 to make additional motions, if any, based on discovery the government has produced but that we have not reviewed to date.

Respectfully submitted,

Mark A. Racanelli
of O'MELVENY & MYERS LLP

cc: Howard E. Heiss, Esq.
AUSA Lauren Goldberg
AUSA Marshall Camp

SO ORDERED 5/6/08
SIDNEY H. STEIN
U.S.D.J.